

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 23-06063-CV-SJ-DGK

**\$8,056.93 FROM BMO HARRIS BANK N.A.,
ACCOUNT NUMBER X6937, IN THE NAME
OF CRAIG A. REYNOLDS AND LANA K.
REYNOLDS,**

**2022 HARLEY DAVIDSON MOTORCYCLE,
VIN: 1HD1TCL16NB951086, and**

**2020 LINCOLN NAVIGATOR, VIN:
5LMJJ2LT1LEL12024,**

Defendants.

**JOINT MOTION TO EXTEND TIME TO
INITIATE JUDICIAL FORFEITURE**

The United States, by the United States Attorney for the Western District of Missouri, Craig Reynolds, represented by counsel Kenneth Hensley, and Lana Reynolds, represented by James Nadolski, (“the Claimants”), (collectively, “the Parties”), as authorized by 18 U.S.C. § 983(a)(3)(A), move the Court to extend the time in which the United States is required to initiate criminal and civil judicial forfeiture from June 5 and 6, 2023, to September 5, 2023, regarding property to which claims have been filed by the Claimants in a nonjudicial administrative forfeiture proceeding with the Federal Bureau of Investigation (“FBI”). The seized property is described as follows:

- a. \$8,056.93 from BMO Harris Bank, N.A., account number x6937, in the name of Craig A. Reynolds and Lana K. Reynolds;

- b. 2022 Harley Davidson motorcycle, VIN: 1HD1TCL16NB951086; and
- c. 2020 Lincoln Navigator, VIN: 5LMJJ2LT1LEL12024.

FBI timely distributed written notice of intent to forfeit the property, as required by 18 U.S.C. § 983(a)(1)(A). On March 8, 2019, Claimant Lana Reynolds timely filed with the FBI a claim as to the \$8,056.93 in BMO Harris funds and the 2020 Lincoln Navigator. On March 9, 2023, Claimant Craig Reynolds timely filed with the FBI a claim as to the \$8,056.93 in BMO Harris funds and the 2022 Harley Davidson. The period for any other person to file a claim to the property under 18 U.S.C. § 983(a)(2)(A)-(E) has now expired. Pursuant to 19 U.S.C. §§ 1608 and 1610, upon the filing of the claim by Claimants, FBI transmitted the claim to the United States Attorney for the purpose of initiating a judicial forfeiture action against the property. The 90-day deadline for the government to file a complaint for forfeiture against the property is June 5 and 6, 2023. As provided in 18 U.S.C. § 983(a)(3)(A), the 90-day period for filing the complaint may be extended by the Court “for good cause shown or upon agreement of the parties.”

The Parties have agreed to extend the time for filing the complaint in order to provide sufficient opportunity to evaluate their respective interests in and positions regarding the property. Therefore, the Parties respectfully request that the Court enter an order extending the deadline by which the United States shall be required to initiate judicial forfeiture shall be extended from June 5 and 6, 2023, up to and including **Tuesday, September 5, 2023**.

Respectfully submitted,

Teresa A. Moore
United States Attorney

Dated: May 31, 2023

/s/ John Constance
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Dated: May 31, 2023

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Dated: May 31, 2023

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